

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RAJESH PATEL, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

VIATRIS, INC., PFIZER INC., MICHAEL  
GOETTLER, SANJEEV NARULA, BRYAN  
SUPRAN, MARGARET M. MADDEN,  
DOUGLAS E. GIORDANO, ROBERT J.  
COURY, IAN READ, and JAMES KILTS,

Defendants.

Case No. 2:21-cv-01769-NR  
The Honorable J. Nicholas Ranjan

**PLAINTIFF'S MOTION FOR  
REMAND**

Plaintiff Rajesh Patel, by and through undersigned counsel, files this Motion for Remand, stating as follows:

1. On October 28, 2021, Plaintiff filed a Class Action Complaint against Defendants Viatris, Inc., Pfizer Inc., Michael Goettler, Sanjeev Narula, Bryan Supran, Margaret M. Madden, Douglas E. Giordano, Robert J. Coury, Ian Read, and James Kilts ("Defendants") in the Court of Common Pleas of Allegheny County, Pennsylvania, alleging violations of the Securities Act of 1933 ("Securities Act").

2. Thereafter, on December 3, 2021, Defendants filed a Notice of Removal in this Court.

3. As demonstrated in the concurrently filed Memorandum in Support of Plaintiff's Motion for Remand, Defendants' removal of this action violates the Securities Act's removal bar, as well as the express exemptions of the Class Action Fairness Act of 2005, and lacks any objectively reasonable basis.

**WHEREFORE**, for the foregoing reasons and those further set forth in Memorandum of Law in Support of Plaintiff's Motion for Remand filed in support of this motion, Plaintiff

respectfully requests that this Court remand this action to the Court of Common Pleas and award attorneys' fees and costs to Plaintiff under 28 U.S.C. §1447(c).

Dated: December 31, 2021

Respectfully submitted,

**LYNCH CARPENTER LLP**

/s/ Kelly K. Iverson

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